REMARKS

By this Amendment, claims 1, 12, 23, 34, and 45 have been amended, and claims 71 and 72 have been added. Support for the amended and added claims can be found throughout the specification. Claims 1-3, 7-25, and 29-70 remain pending in the application. Applicant respectfully submits that no new matter has been added.

In the Office Action (OA) dated May 12, 2009, the Examiner rejected claims 1-3, 7-25, and 29-70 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,094,684 to Pallmann. Applicant respectively traverses the rejection.

Rejection Under 35 U.S.C. § 102(e)

The Examiner rejected claims 1-3, 7-25, and 29-70 under 35 U.S.C. §102(e) as being anticipated by Pallmann. Applicant respectfully traverses the rejection because the pending claims are not anticipated by Pallmann.

There are several differences between Pallman and the claimed invention. Namely, Pallman acquires data from a selected target, which may be an application program, then filters and converts the data to match the format of a specific data target, which may also be an application program, and finally delivers the data to the data target (see FIG. 13). Essentially, Pallman converts data directly from one open format to another open format.

Pallman clearly discloses retrieving data from a data source and communicating it to a data target in a specified manner (see column 1, lines 40-43). The context of Pallman's invention is much more narrow than that of the claimed invention, namely, converting data from one portable format to another: "switching from one application

program to another, or from one computer platform to another. It can also be required when sharing data between two applications" (see column 2, lines 33-38). Pallman's focus is on data conversion between open or portable formats (see column 3, lines 45-47). In particular, Pallman emphasizes that: "Embodiments of the present invention can be implemented to accept data from any data source **104** platform, provided the source platform and implementation platform share a common method of communication" (see column 5, lines 57-61).

Although Pallman states that the system is not limited to open or portable formats, (see column 6, lines 10-16), Pallman provides no disclosure of, nor does it enable the use of, any data format other than a portable data format. The only formats that Pallman discloses are open or portable formats, such as ODBC (Open Data Base Connection)-compliant application formats, and Pallman fails to disclose or enable any format other than an open or portable format. Although Pallman references a "wide variety" of text data formats, (see column 15, lines 10-11), each of the examples of data sources or data targets that Pallman discloses are open, or in the case of applications, ODBC-compliant formats, or otherwise open or portable data formats:

Image Types :
-       BMP;
-       GIF;
-       JPEG;
-       PCX;
-       TIFF;
-       WMF; and
-       Icon

Audio Types:
-       MIDI;
-       Wave; and
-       RealAudio;

Video Types:
- AVI
- MPEG; and
- QuickTime

Data Targets (Applications):
- Microsoft Excel;
- Lotus 1-2-3;
- Corel Quattro Pro;
- Microsoft Access;
- Lotus Approach;
- Borland Paradox;
- Text file;
- Microsoft Word;
- Lotus Word Pro;
- Corel WordPerfect;
- Netscape;
- Internet Explorer;
- HTML document;
- Write;
- Notepad;
- Paintbrush;
- Text file;
- Image file;
- Audio file; and
- Video file.

(see column 56, lines 30 through column 57, line 11). Specifically, Pallman discloses only text files (ASCII), ODBC-compliant, HTML, TCP/IP, FTP, and other portable formats.

Pallman discloses that "data retrieval plug-ins" may be used for a remote site that does not use FTP, HTTP, or ODBC (see column 27, lines 38-54). However, Pallman provides no enabling disclosure of any such plug-in for any format other than the open or portable formats listed. For example, at column 35, lines 3-65, Pallman discloses three alternative methods of converting data, none of which disclose or enable the use of data other than in an open or portable format. Nor would one of ordinary skill in the art, without undue experimentation, be able to devise such a plug-in from Pallman's

disclosure. Rather, Pallman discloses that "a plug in could interact with the user, form criteria for an SQL engine, query a remote database, and ultimately pass the selected information on to the machine" (see column 28, lines 440-43). However, this disclosure specifically employs an SQL query, namely, an open or portable format that is ODBC-compliant.

Pallman recognizes that: "Naturally, some formats are more difficult to convert than others." (see column 29, lines 40-41). Yet, this is the very purpose of the claimed invention, to address these difficult data formats. Pallman neither discloses nor enables a solution to this problem, limiting itself to open or portable data formats. Thus, even Pallman's disclosure of plug-ins fails to disclose or enable the use of data formats other than open or portable data formats. Instead, Pallman places strong emphasis on "normalizing" the data, so that it can readily be converted and transferred from one open application to another (see column 34, lines 4-22; column 35, lines 3-18).

Thus, Pallman discloses a system in which the data is acquired from a data source and transformed, if desired, and delivered to a data target (see column 7, line 63 through column 8, line 4). The claimed invention, in contrast, directly addresses the more difficult problem that Pallman fails to resolve of how to combine data that is not normalized and, in certain embodiments, where at least one of the sources of the data is in a format other than a portable data format.

To accomplish this goal, claims 1, 12, 23, 34, and 45 disclose: a first application for maintaining data in a first portable format, a second software application for maintaining data in a second format other than said first portable format, and a professional services project management application, as well as two servers. Pallman,

in contrast, discloses only a direct, application-to-application conversion and transfer of normalized (portable format) data, and an application-to-application transfer of normalized (portable format) data through a single ODBC-compliant, SQL server query.

Further, added claims 71 and 72 recite a first software application for maintaining data in a first portable format, and a second software application for maintaining data in a second format, **wherein the second format is not a portable format** (emphasis added). As discussed herein, Pallman fails to resolve where at least one of the sources of the data is in a format other than a portable data format. As such, Pallman fails to disclose each and every element as recited in added claims 71 and 72.

Still further, claim 23 recites a method of managing professional services project information including, among other things, "communicating data from a second software application to a professional services project management application through a first server querying a second server to retrieve the data from said second software application in said first portable format." Claims 1, 12, 34, and 45 recite similar elements.

Nowhere does Pallmann disclose the functionality of the claimed method wherein the second software application communicates data to a professional services project management application through a first server querying a second server to retrieve the data from said second software application in said first portable format, as recited in claim 23, and similarly recited in claims 1, 12, 34, and 45. Instead, Pallmann discloses a delivery task specifying a name of a data source, a format of the source data (e.g. text or HTML format), and the communication protocol (see column 11, lines 10-17). Referring to FIG. 13 of Pallmann, a user can specify a data access method 1312, such

as Web page, FTP server, local file, ODBC server, or plug in; and a data type 1330 used to indicate the data type of the information to be acquired, such as report/table, text, image, audio, and video. The user can further specify a delivery method 1354 for the outputted data.

The Examiner alleges that the format conversion of the FTP server 1314 and the ODBC server 1320 of Pallmann is comparable to communicating data from a second software application to a professional services project management application through a first server, as recited in the claims. Applicant respectfully disagrees with the Examiner because claims 1, 12, 23, 34, and 45 disclose that the data is communicated to the professional services project management application through a first server querying a second server to retrieve the data from said second software application. In contrast, Pallmann merely discloses a radio option in the data access method frame 1312 whereby a user is allowed to select one and only one data access method. Indeed, Pallmann indicates that the "frame 1312's appearance changes based on the data access method option button currently selected." As such, a first server (e.g. FTP server 1314) would not be able to query a second server (e.g. ODBC server 1320) because there can be only one data access source. Therefore, Pallman fails to disclose the functionality of the claimed method wherein the second software application communicates data to a professional services project management application through a first server querying a second server to retrieve the data from said second software application in said first portable format, as recited in claim 23, and similarly recited in claims 1, 12, 34, and 45.

Accordingly, Pallmann fails to disclose each and every element of claims 1, 12, 23, 34, and 45, and therefore fails to anticipate claims 1, 12, 23, 34, and 45. As such, the rejection of claims 1, 12, 23, 34, and 45 under 35 USC §102(e) is improper and should be withdrawn. Further, claims 2, 3, 7-11, 13-22, 24, 25, 29-33, 35-44, and 46-70 depend from either claims 1, 12, 23, 34, or 45. Therefore, the rejection of these claims should be withdrawn for at least the reasons mentioned above.

Conclusion

In view of the foregoing amendment and remarks, Applicant submits that the claims are not anticipated by the prior art references applied against this application. Applicant therefore requests the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

If the Examiner believes that additional discussions or information might advance the prosecution of the instant application, the Examiner is invited to contact the undersigned at the telephone number listed below to expedite resolution of any outstanding issues.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 50-2961.

Respectfully submitted,

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By: _____

Matthew Carey
Reg. No. 61,082

Scott Balderston
Reg. No. 35,436

MH2 TECHNOLOGY LAW GROUP LLP
1951 Kidwell Drive
Suite 550
Tysons Corner, VA 22182
Phone: (703) 917-0000
Facsimile: (703) 997-4905